

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

FTX TRADING LTD. and MACLAURIN  
INVESTMENTS LTD.,

Plaintiffs,

-against-

LOREM IPSUM UG, PATRICK GRUHN,  
ROBIN MATZKE, and BRANDON WILLIAMS,

Defendants.

Adv. Pro. No. 23-50437 (JTD)

**CERTIFICATION OF COUNSEL**

I, Matthew B. McGuire, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On July 12, 2023, FTX Trading Ltd. and Maclaurin Investments Ltd. (collectively, the “Plaintiffs”) commenced the above-captioned adversary proceeding (the “Adversary Proceeding”), pending in the United States Bankruptcy Court for the District of Delaware (the “Court”), by filing the *Complaint for Avoidance and Recovery of Transfers and Obligations Pursuant to 11 U.S.C. §§ 105, 547, 548, and 550, Breach of Fiduciary Duty*

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

*Pursuant to Antiguan Common Law and the Antigua International Business Corporations Act, and for Disallowance of Claims Pursuant to 11 U.S.C. § 502(D) [Adv. D.I. 1] (“Complaint”).*

2. On August 9, 2023, the Plaintiffs filed the *Stipulation Regarding Extension of Defendants’ Response Deadline* [Adv. D.I. 4] (the “Stipulation”) between Plaintiffs and Defendants, Lorem Ipsum UG, Patrick Gruhn, Robin Matzke, and Brandon Williams (the “Defendants” and together with the Plaintiffs, the “Parties”), extending the Defendants’ deadline to answer, move against, or otherwise respond to the Complaint to September 11, 2023.

3. Pursuant to the Stipulation, the Parties also agreed to submit a case management plan and scheduling order to the Court by or before August 24, 2023.

4. The Parties have conferred and agree to a proposed form of a case management plan and scheduling order (the “Case Management Plan and Scheduling Order”) governing the Adversary Proceeding, a copy of which is attached hereto as **Exhibit A**.

5. Accordingly, the Parties respectfully request that the Bankruptcy Court enter the Case Management Plan and Scheduling Order at its earliest convenience.

Dated: August 22, 2023  
Wilmington, Delaware

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